

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	(Jointly Administered)
	:	Re: ECF Nos. 6143 & 6854
Debtors. ¹	:	
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**JOINDER IN OMNIBUS REPLY IN SUPPORT OF THE URGENT MOTION OF
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD OF
PUERTO RICO TO ENFORCE ORDER UNDER BANKRUPTCY RULES
1007(i) AND 2004 AUTHORIZING DISCOVERY AND COMPELLING
DISCLOSURE OF LISTS OF SECURITY HOLDERS**

To the Honorable United States District Judge Laura Taylor Swain:

PLEASE TAKE NOTICE that the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), acting by and through its Special Claims Committee (the “Special Claims Committee”)² hereby joins in the *Omnibus Reply in Support of the Urgent Motion of the Financial Oversight and Management Board of Puerto Rico to Enforce Order Under Bankruptcy Rules 1007(I) and 2004 Authorizing Discovery and Compelling Disclosure Of Lists Of Security Holders* [ECF No. 6924] (the “Omnibus Reply”) and adopts the arguments

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

² The Identical Motion (as defined herein) was filed by proposed special litigation counsel and local counsel to the Unsecured Creditors Committee acting as conflicts counsel.

therein in support of the *Urgent Motion of the Financial Oversight And Management Board Of Puerto Rico To Enforce Order Under Bankruptcy Rules 1007(I) and 2004 Authorizing Discovery And Compelling Disclosure Of Lists Of Security Holders* [ECF No. 6854] (the “Identical Motion”), and states:

1. The Identical Motion was filed by the Special Claims Committee through undersigned conflicts counsel. It is the counterpart to a similarly titled motion filed at ECF No. 6853 by the Special Claims Committee via its counsel (the “Principal Motion”). The Response of the Bank Defendants (defined in the Omnibus Reply) and additional informal Responses received to date appear directed to both the Principal Motion and the Identical Motion.

2. The undersigned counsel has conferred with various parties-in -interest regarding the relief sought in the Identical Motion as well as issues addressed in the Omnibus Reply.

3. Additionally, shortly before the filing hereof, undersigned counsel received the Limited Objection and Joinder of Wells Fargo to the Joint Limited Objection of Bank Defendants to the Urgent Motion of the Financial Oversight and Management Board of Puerto Rico to Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and Compelling Disclosure of Lists of Security Holders, [ECF No. 6930] (the “Wells Fargo Objection”) filed by entities affiliated with Wells Fargo Bank, National Association (“Wells Fargo”).

4. The Wells Fargo Objection pertains to the Identical Motion, but refers to matters relating to the Principal Motion [ECF No. 6853].

5. The substantive arguments in the Wells Fargo Objection are addressed in the Omnibus Reply, which are incorporated herein by reference and adopted in support of the Identical Motion.

6. Wells Fargo additionally appears to object regarding service of the Identical Motion to its mailing address. In order to address said concern, undersigned counsel agreed to an extension of the objection deadline to allow Wells Fargo an opportunity to file its objection.

7. The Special Claims Committee hereby joins in the Omnibus Reply, by and through the proposed special litigation counsel and local counsel of the Official Committee of Unsecured Creditors acting as conflicts counsel, and adopts the arguments set forth therein in support of the Identical Motion.

Dated: May 13, 2019

/s/John Arrastia

John Arrastia, Esq. (Pro Hac Vice)
John H. Genovese, Esq. (Pro Hac Vice)
Jesus M. Suarez, Esq. (Pro Hac Vice)
Mariaelena Gayo-Guitian, Esq. (Pro Hac Vice)
GENOVESE JOBLOVE & BATTISTA, P.A
100 SE 2nd Street, Suite 4400
Miami, Florida 33131
Tel: 305-349-2300
jarrastia@gjb-law.com
jgenovese@gjb-law.com
jsuarez@gjb-law.com
mguitian@gjb-law.com

*Proposed Special Litigation Counsel to the Official
Committee of Unsecured Creditors, acting as conflict
counsel*

/s/JUAN J. CASILLAS-AYALA

CASILLAS, SANTIAGO & TORRES LLC
Juan J. Casillas Ayala, Esq. (USDC - PR 218312)
Alberto J. E. Añeses Negrón, Esq. (USDC - PR 302710)
Israel Fernández Rodríguez, Esq. (USDC - PR 225004)
Juan C. Nieves González, Esq. (USDC - PR 231707)
Cristina B. Fernández Niggemann, Esq. (USDC - PR
306008)
PO Box 195075
San Juan, PR 00919-5075
Tel.: (787) 523-3434
Fax: (787) 523-3433
jcasillas@cstlawpr.com
aaneses@cstlawpr.com
ifernandez@cstlawpr.com
jnieves@cstlawpr.com
cfernandez@cstlawpr.com

*Counsel to the Official Committee of Unsecured
Creditor, acting as local conflict counsel*